

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Chapter 11
	§	
VANGUARD NATURAL RESOURCES,	§	Case No. 17-30560
LLC, <i>et al.</i> ,	§	
	§	(Jointly Administered)
Reorganized Debtors.	§	
	§	

**REORGANIZED DEBTORS' UNOPPOSED EMERGENCY
MOTION FOR CONTINUANCE**

THIS MOTION SEEKS ENTRY OF AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

Vanguard Natural Resources, LLC, and its affiliated reorganized debtors in these cases (collectively, “Vanguard” or the “Reorganized Debtors”) submit this unopposed emergency motion (the “Motion”) for a continuance of the hearing (the “Hearing”) on the objection (the “Objection”) to Claim 1011 (the “Claim”) filed by the State of New Mexico, Taxation and Revenue Department (the “Department” or “Claimant”), which was previously scheduled for January 15, 2019, at 10:00 a.m. (prevailing Central Time), and states as follows:

PRELIMINARY STATEMENT

1. On July 24, 2018, Vanguard filed the *Reorganized Debtors’ Nineteenth Omnibus Objection to Certain Claims (Satisfied Claims, Amended Claims, Late Filed Claims, and No*

Liability Claims) [Docket No. 1891], through which Vanguard made its Objection to the Department's Claim.

2. On August 7, 2018, Claimant filed *NM Taxation and Revenue Department's Response to Reorganized Debtors' Nineteenth Omnibus Objection to Claims (Doc. 1891)* [Docket No. 1901].

3. The Hearing on Vanguard's Objection to the Department's Claim was originally scheduled for October 18, 2018.

4. At the request of the parties, the Court entered an order continuing the Hearing to January 15, 2019. *Order Granting Reorganized Debtors' Nineteenth Omnibus Objection to Claims (Satisfied Claims, Amended Claims, Late Filed Claims, and No Liability Claims)* ¶ 6.b [Docket No. 1941].

5. The parties are presently exchanging documents in connection with discovery they are conducting on the Claim and need additional time in advance of the Hearing to review those productions.

6. The time available to the Department to complete discovery in advance of the Hearing is further limited by its counsel's year-end, state-mandated leave and holiday travel schedule.

7. In respect of the foregoing, the parties would like to continue the Hearing to a later date in order to allow them more time to complete discovery on the Claim.

8. The Department has confirmed to Vanguard that it supports the relief requested in this Motion.

9. This Motion is not sought for delay only, but so that justice may be served.

WHEREFORE, Vanguard requests that the Hearing be rescheduled for March 6, 2019, at 10:00 a.m. (prevailing Central Time) or as soon thereafter as the Court's calendar permits.

Dated: December 28, 2018

Respectfully Submitted,

BLANK ROME LLP

/s/ James T. Grogan

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Counsel to the Reorganized Debtors

CERTIFICATE OF SERVICE

I certify that on December 28, 2018, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on counsel to the Department. Additionally, I have caused Prime Clerk, LLC, the Reorganized Debtors' Claims and Noticing Agent, to serve the foregoing document on the master service list.

/s/ Matthew E. Kaslow

Matthew E. Kaslow